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Via ECF

Hon. Colleen McMahon, U.S.D.J.  
 United States District Court  
 Southern District of New York  
 500 Pearl Street, Room 2550  
 New York, New York 10007

September 19, 2023

9/19/2023  
 OK - good luck in your  
 case Clement -  
 se folks ✓

**Re: Irene Robles v. Target Corporation**

**SDNY Case No.: 1:23-cv-00998**

**Our File No.: TARN-202**

Dear Judge McMahon:

**MEMO ENDORSED**

This office represents defendant, Target Corporation ("Target"), in the above captioned matter.

Please accept this letter motion as the parties' joint request for an extension of existing discovery deadlines.

The parties seek an extension of the deadline for expert discovery, including service of expert reports. Likewise, the parties seek an adjournment of the deadline to file the joint-pretrial order.

This is the first request for an adjournment or extension of any deadline. It is with the consent of plaintiff's counsel, and indeed, made jointly.

The parties seek a 60 extension of the aforesaid discovery deadlines. The present deadline for service of plaintiff's expert report is September 29, 2023. Defendant's expert report must be disclosed by October 31, 2023. October 31, 2023 is also the deadline for all discovery.

Finally, the joint pre-trial order is currently due December 29, 2023.

The reason for the adjournment is that the parties have been concentrating their efforts on attempting to settle the case. In order to do so, the parties have been attempting to obtain the amounts of both the

Medicare and a Medicare Advantage plan lien. Plaintiff's counsel has had difficulty obtaining those. Without knowledge of the lien amounts, the parties are unable to settle the case.

As the parties have now exhausted their immediate efforts to obtain these lien amounts, the parties would like to complete discovery.

If Your Honor is inclined to grant this request, the new discovery deadlines will be as follows: plaintiff's expert report(s): November 8, 2023; defendant's expert report(s): January 2, 2024; all discovery completed by January 2, 2024; the joint pre-trial order, together with all other pre-trial submissions required by Your Honor's individual rules shall be submitted on or before February 27, 2024.

The parties believe that for the reasons above, good cause exists for the extensions sought herein.

Should Your Honor wish, the parties will prepare an amended civil case management plan for Your Honor's review.

Thank you for Your Honor's consideration.

Respectfully submitted,

*/s/Mitchell B. Levine*

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